

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

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IN RE:

Genevieve K. Froehlich

Debtor(s).

:
: CASE NO.: 1:18-bk-03800-HWV
: CHAPTER: 13
:
: **NOTICE OF APPEARANCE**
:
: HON. JUDGE.: Henry W. Van Eck
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NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned Chapter 13 case on behalf Rushmore Loan Management Services, LLC as servicer for U.S. Bank Trust National Association, as Trustee of the Dwelling Series IV Trust, and hereby requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the following:

FRIEDMAN VARTOLO, LLP
Attorneys for Rushmore Loan Management
Services, LLC as servicer for U.S. Bank Trust
National Association, as Trustee of the Dwelling
Series IV Trust
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
bankruptcy@FriedmanVartolo.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes all pleadings of any kind including, without limitation, all notices, motions, complaints and orders, whether written or oral, formal or informal, however transmitted, related in any way to the debtor, its property or its estates. The persons listed above request that their names and addresses be added to the mailing matrix.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction or venue of this Court for any purpose other than with respect to this Notice, (v) an election of remedy, or (vi) any other right, claim, defense, setoff, or recoupment, in law or in equity, under any agreement, all of which are expressly waived.

Dated: 04/04/2023
Garden City, New York

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Rushmore Loan
Management Services, LLC
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UNITED STATES BANKRUPTCY COURT
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IN RE:

Genevieve K. Froehlich

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: CASE NO.: 1:18-bk-03800-HWV
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: **CERTIFICATE OF SERVICE**
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: HON. JUDGE.: Henry W. Van Eck
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CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE

The undersigned counsel for Rushmore Loan Management Services, LLC as servicer for U.S. Bank Trust National Association, as Trustee of the Dwelling Series IV Trust (“Secured Creditor”) certify that, on the date stated hereon, I caused to be served a copy of the Notice of Appearance filed on behalf of Secured Creditor on the parties in the manner specified on the attached service list.

The type(s) of service made on the parties was: electronic notification or first-class mail, postage pre-paid. Where service is by electronic notification, the address of the party is listed for identification purposes only.

EXECUTED ON: April 4th, 2023
Garden City, New York

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for Rushmore Loan
Management Services, LLC
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
T: (212) 471-5100
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Bankruptcy@FriedmanVartolo.com

Service by NEF

Trustee

Jack N Zaharopoulos
Standing Chapter 13
(Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Debtor's Counsel

John Matthew Hyams
Law Offices of John M. Hyams
2023 N 2nd St
Harrisburg, PA 17102

Asst. U.S. Trustee

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

Service by First-Class Mail

Debtor(s)

Genevieve K. Froehlich
345 Rosewood Lane
Harrisburg, PA 17111
DAUPHIN-PA